

<i>SERFF Tracking Number:</i>	<i>ALSX-125395027</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Indemnity Company</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
<i>Company Tracking Number:</i>	<i>R18891</i>		
<i>TOI:</i>	<i>17.0 Other Liability - Claims Made/Occurrence</i>	<i>Sub-TOI:</i>	<i>17.0021 Personal Umbrella and Excess</i>
<i>Product Name:</i>	<i>Personal Umbrella</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18891</i>		

Filing at a Glance

Company: Allstate Indemnity Company	SERFF Tr Num: ALSX-125395027	State: Arkansas
Product Name: Personal Umbrella	SERFF Status: Closed	State Tr Num: EFT \$25
TOI: 17.0 Other Liability - Claims Made/Occurrence		
Sub-TOI: 17.0021 Personal Umbrella and Excess	Co Tr Num: R18891	State Status: Fees verified and received
Filing Type: Rule	Co Status:	Reviewer(s): Alexa Grissom, Betty Montesi, Brittany Yielding
	Author: SPI AllState	Disposition Date: 03/04/2008
	Date Submitted: 12/20/2007	Disposition Status: Filed
Effective Date Requested (New): 03/10/2008		Effective Date (New): 03/10/2008
Effective Date Requested (Renewal): 03/10/2008		Effective Date (Renewal): 05/12/2008
State Filing Description:		

General Information

Project Name: 2007 - DeHoyos Appeals Process Filing	Status of Filing in Domicile: Authorized
Project Number: R18891	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 03/04/2008	
State Status Changed: 01/29/2008	Deemer Date:
Corresponding Filing Tracking Number:	
Filing Description:	
Insurance Scoring Appeals Process	

With this filing, Allstate Indemnity Company is implementing an appeals process for Insurance Scoring in the state of Arkansas. The same process will be implemented in all Allstate Group companies and lines that order credit reports for the use of Insurance Scoring in Arkansas. The appeals process will allow consumers whose Insurance Score has been

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<i>Product Name:</i>	<i>Personal Umbrella</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18891</i>		

adversely impacted by extraordinary circumstances to appeal the Insurance Score, Allstate has previously assigned to them. If an insured meets the criteria listed in the rule, a neutral Insurance Score will be applied to the policy. The conditions under, which an insured may appeal his or her Insurance Score may be found in the attached Rule Pages.

This change will not affect the way Allstate initially assigns an Insurance Score to an insured. There is no rate change associated with this filing.

Effective Date:
 New business: March 10, 2008
 Renewals: March 10, 2008

Company and Contact

Filing Contact Information

Patrick Torsney,	ptors@allstate.com
2775 Sanders Road	(847) 402-5000 [Phone]
Northbrook, IL 60062	(847) 402-9757[FAX]

Filing Company Information

Allstate Indemnity Company	CoCode: 19240	State of Domicile: Illinois
2775 Sanders Road	Group Code: 8	Company Type:
Suite A5		
Northbrook, IL 60062	Group Name: Allstate	State ID Number:
(847) 402-5000 ext. [Phone]	FEIN Number: 36-6115679	

Filing Fees

Fee Required?	Yes
Fee Amount:	\$25.00
Retaliatory?	No
Fee Explanation:	Independent Rule Filings - All P&C Lines = \$25
Per Company:	No

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
Company Tracking Number: *R18891*
TOI: *17.0 Other Liability - Claims Made/Occurrence* *Sub-TOI:* *17.0021 Personal Umbrella and Excess*
Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Allstate Indemnity Company	\$25.00	12/20/2007	17194542

SERFF Tracking Number: ALSX-125395027 State: Arkansas
Filing Company: Allstate Indemnity Company State Tracking Number: EFT \$25
Company Tracking Number: R18891
TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess
Product Name: Personal Umbrella
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Alexa Grissom	03/04/2008	03/04/2008

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Alexa Grissom	02/15/2008	02/15/2008	SPI AllState	02/28/2008	02/28/2008
Pending Industry Response	Alexa Grissom	01/24/2008	01/24/2008	SPI AllState	02/07/2008	02/07/2008
Pending Industry Response	Alexa Grissom	01/03/2008	01/03/2008	SPI AllState	01/16/2008	01/16/2008
Pending Industry Response	Alexa Grissom	01/24/2008				

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
New effective dates.	Note To Reviewer	SPI AllState	04/29/2008	04/29/2008

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
Company Tracking Number: *R18891*
TOI: *17.0 Other Liability - Claims Made/Occurrence* *Sub-TOI:* *17.0021 Personal Umbrella and Excess*
Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

Disposition

Disposition Date: 03/04/2008

Effective Date (New): 03/10/2008

Effective Date (Renewal): 05/12/2008

- Effective Date (Renewal) changed from NULL to 05/12/2008 by Grissom, Alexa on 05/05/2008.

Status: Filed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: ALSX-125395027 State: Arkansas

Filing Company: Allstate Indemnity Company State Tracking Number: EFT \$25

Company Tracking Number: R18891

TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess

Product Name: Personal Umbrella

Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Item Type	Item Name	Item Status	Public Access
Supporting Document	NAIC Loss Cost Filing Document for OTHER than Workers' Comp	Filed	Yes
Supporting Document	NAIC loss cost data entry document	Filed	Yes
Supporting Document	Uniform Transmittal Document-Property & Casualty	Filed	Yes
Supporting Document	Response to DOI Objection	Filed	Yes
Supporting Document	objection resp 2	Filed	Yes
Supporting Document	DOI Obj #3	Filed	Yes
Rate	CheckingList_R18891	Filed	Yes
Rate	Manual_R18891	Filed	Yes

SERFF Tracking Number: ALSX-125395027 State: Arkansas
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TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess
Product Name: Personal Umbrella
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 02/15/2008
Submitted Date 02/15/2008
Respond By Date
Dear Patrick Torsney,

This will acknowledge receipt of the captioned filing. Per our Director, please delete the language stating the effective date is 03-01-08. The correct date is on or after January 1, 2004, and is not at the discretion of Allstate. The subsequent reassignment must be to the "neutral" tier from the credit perspective.

Please feel free to contact me if you have questions.

Sincerely,
Alexa Grissom

Response Letter

Response Letter Status Submitted to State
Response Letter Date 02/28/2008
Submitted Date 02/28/2008

Dear Alexa Grissom,

Comments:

Response to 2/15/8 objection.

Response 1

Comments: Please see attached document re: 2/15/8 objection.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: DOI Obj #3

Comment:

No Form Schedule items changed.

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
Company Tracking Number: *R18891*
TOI: *17.0 Other Liability - Claims Made/Occurrence* *Sub-TOI:* *17.0021 Personal Umbrella and Excess*
Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

No Rate/Rule Schedule items changed.

Please contact Patrick Torsney at 847 402 7309 or at ptors@allstate.com if you have any questions.

Sincerely,
SPI AllState

SERFF Tracking Number: ALSX-125395027 State: Arkansas
Filing Company: Allstate Indemnity Company State Tracking Number: EFT \$25
Company Tracking Number: R18891
TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess
Product Name: Personal Umbrella
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Objection Letter

Objection Letter Status Pending Industry Response

Objection Letter Date 01/24/2008

Submitted Date 01/24/2008

Respond By Date

Dear Patrick Torsney,

This will acknowledge receipt of the captioned filing. Please advise how Allstate would assist someone in Groups 3 and higher.

Please feel free to contact me if you have questions.

Sincerely,

Alexa Grissom

Response Letter

Response Letter Status Submitted to State

Response Letter Date 02/07/2008

Submitted Date 02/07/2008

Dear Alexa Grissom,

Comments:

Response to 1/24/8 objection.

Response 1

Comments: Please see attached documents re: 1/24/8 objection.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: objection resp 2

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
Company Tracking Number: *R18891*
TOI: *17.0 Other Liability - Claims Made/Occurrence* *Sub-TOI:* *17.0021 Personal Umbrella and Excess*
Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

Please contact Patrick Torsney at 847 402 7309 or at ptors@allstate.com if you have any questions.

Sincerely,
SPI AllState

SERFF Tracking Number: ALSX-125395027 State: Arkansas
Filing Company: Allstate Indemnity Company State Tracking Number: EFT \$25
Company Tracking Number: R18891
TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess
Product Name: Personal Umbrella
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Objection Letter

Objection Letter Status Pending Industry Response

Objection Letter Date 01/03/2008

Submitted Date 01/03/2008

Respond By Date

Dear Patrick Torsney,

This will acknowledge receipt of the captioned filing. Please provide more information regarding this proposed rule.

Does an insured have to be in Group 1 for it to apply?

Please feel free to contact me if you have questions.

Sincerely,

Alexa Grissom

Response Letter

Response Letter Status Submitted to State

Response Letter Date 01/16/2008

Submitted Date 01/16/2008

Dear Alexa Grissom,

Comments:

Response to 1/3/8 objection.

Response 1

Comments: Please see attached document re: 1/3/8 objection.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Response to DOI Objection

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

State: *Arkansas*

State Tracking Number: EFT \$25

Sub-TOI: 17.0021 Personal Umbrella and Excess

17.0021 Personal Umbrella and Excess

m if you have any questions. Thank you Patrick Torsne

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
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Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

Objection Letter

Objection Letter Status Pending Industry Response

Objection Letter Date 01/24/2008

Submitted Date

Respond By Date

Dear Patrick Torsney,

This will acknowledge receipt of the captioned filing. It appears that Group 2 is the second highest rated tier. Is this correct?

Please feel free to contact me if you have questions.

Sincerely,

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
Company Tracking Number: *R18891*
TOI: *17.0 Other Liability - Claims Made/Occurrence* *Sub-TOI:* *17.0021 Personal Umbrella and Excess*
Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

Note To Reviewer

Created By:

SPI AllState on 04/29/2008 02:17 PM

Subject:

New effective dates.

Comments:

The new effective dates for this filing for new business & renewals will be 5/12/8

<i>SERFF Tracking Number:</i>	<i>ALSX-125395027</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Allstate Indemnity Company</i>	<i>State Tracking Number:</i>	<i>EFT \$25</i>
<i>Company Tracking Number:</i>	<i>R18891</i>		
<i>TOI:</i>	<i>17.0 Other Liability - Claims Made/Occurrence</i>	<i>Sub-TOI:</i>	<i>17.0021 Personal Umbrella and Excess</i>
<i>Product Name:</i>	<i>Personal Umbrella</i>		
<i>Project Name/Number:</i>	<i>2007 - DeHoyos Appeals Process Filing/R18891</i>		

Rate Information

Rate data does NOT apply to filing.

SERFF Tracking Number: ALSX-125395027 State: Arkansas
 Filing Company: Allstate Indemnity Company State Tracking Number: EFT \$25
 Company Tracking Number: R18891
 TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess
 Product Name: Personal Umbrella
 Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Rate/Rule Schedule

Review Status:	Exhibit Name:	Rule # or Page #:	Rate Action	Previous State Filing Attachments Number:
Filed	CheckingList_R18891	R18891	New	R18891.PDF
Filed	Manual_R18891	R18891	Replacement	R18891.PDF

CHECKING LIST FOR PERSONAL UMBRELLA POLICY

Printing dates are shown on each page to facilitate identification of different editions, but have no direct connection with the effective date of the page.

RULES

Enclosed: Pages 5-1 and 5-2 dated 1-1-2008

Withdrawn: Pages 5-1 and 5-2 dated 9-02-2005

RULE 5 – INSURANCE SCORE**A. INITIAL INSURANCE SCORE DETERMINATION**

At policy inception, an Insurance Score Group will be assigned to the policy based on the Insurance Score assigned when the credit report(s) ordered in connection with the policy were requested. The point values for the Insurance Score Groups are as follows:

For Insurance Score Group assignment on or after 2/20/06:

Insurance Score Group	Insurance Score	Points
1	0 – 395	0
2	396 – 417	7
3	418 – 446	21
4	447 – 490	33
5	491 – 999	49

The Insurance Score Group will be assigned at the time of the last credit report ordering, regardless of the effective date of the policy.

With respect to credit reports requested on and after 2/20/06 where a credit report cannot be obtained, or where a credit report consists only of inquiries, an Insurance Score will be assigned based on the age of the individual at the time of the credit report request as follows:

Age	Insurance Score
Less than 19 years old	455
19 – 64 years old	505
65 years old or older	430

The policy of any insured whose credit report was ordered by Allstate Indemnity Company for the purpose of tier determination pursuant to this rule on or after 3/10/2008 may, at Allstate's sole discretion, be assigned to Insurance Score Group 2 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by any of the following extraordinary circumstances: divorce; death of a spouse or member of the same household; involuntary unemployment; catastrophic medical expense; care of adult dependent; identity theft; long-term injury, illness or disability; care of a dependent grandchild; or domestic violence.

B. SUBSEQUENT INSURANCE SCORE DETERMINATION

At each renewal, the same Insurance Score will continue to apply unless the following applies:

1. Prior to every renewal effective date following the effective date of the policy for which

credit report(s) were most recently ordered to determine the applicable Insurance Score and only at the named insured's annual request, a new credit report(s) will be obtained for all applicable insureds on the policy at the time of reorder. The reorder will be done according to the procedure regarding ordering of credit reports that is in effect for Allstate Indemnity Company at the time of reorder. If an insured requests a reorder, the next automatic reorder will take place prior to the renewal effective date following the effective date of the policy for which the credit report(s) was most recently ordered to determine the applicable Insurance Score.

NOTE: If named insured requests a credit report reorder(s) less than 45 days prior to the renewal effective date of the policy, the updated Insurance Score will be reflected in the Insurance Score Group for the next following policy period.

2. For policies written before 2/20/06, prior to the first renewal effective date on or after 4/06/06, a new credit report(s) will be obtained for all applicable insureds on the policy at the time of renewal, according to the procedure regarding ordering of credit reports that is in effect for Allstate Indemnity Company at the time of the reorder, and the applicable Insurance Score Group will be assigned as determined in Section A as of such renewal date.

The policy of any insured whose credit report was ordered by Allstate Indemnity Company for the purpose of tier determination pursuant to this rule on or after 3/10/2008 may, at Allstate's sole discretion, be assigned to Insurance Score Group 2 retroactive to the most recent effective date of the policy, if such insured provides proof acceptable to Allstate that his or her credit information has been negatively impacted by any of the following extraordinary circumstances: divorce; death of a spouse or member of the same household; involuntary unemployment; catastrophic medical expense; care of adult dependent; identity theft; long-term injury, illness or disability; care of a dependent grandchild; or domestic violence.

C. CREDIT REPORT REORDERS

In the event it is necessary to reorder any credit report(s) other than for reasons listed in Section B above, all credit reports needed to assign the policy to an Insurance Score Group will be reordered. New credit report(s) will be obtained for all applicable insureds on the policy at the time of the reorder, according to the procedure regarding ordering of credit reports that is in effect for Allstate Indemnity Company at the time of the reorder, and the applicable Insurance Score Group will be assigned as determined in Section A.

SERFF Tracking Number: ALSX-125395027 State: Arkansas
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TOI: 17.0 Other Liability - Claims Made/Occurrence Sub-TOI: 17.0021 Personal Umbrella and Excess
Product Name: Personal Umbrella
Project Name/Number: 2007 - DeHoyos Appeals Process Filing/R18891

Supporting Document Schedules

Review Status:
Bypassed -Name: NAIC Loss Cost Filing Document
Filed 03/04/2008
for OTHER than Workers' Comp
Bypass Reason: N/A - Loss costs are not relevant to this filing.
Comments:

Review Status:
Bypassed -Name: NAIC loss cost data entry document
Filed 03/04/2008
Bypass Reason: N/A - Loss costs are not relevant to this filing.
Comments:

Review Status:
Satisfied -Name: Uniform Transmittal Document-
Filed 03/04/2008
Property & Casualty
Comments:
Attachment:
AR - NAIC P&C TRANSMITTAL DOCUMENT.PDF

Review Status:
Satisfied -Name: Response to DOI Objection
Filed 03/04/2008
Comments:
Attachment:
Response to DOI Objection.PDF

Review Status:
Satisfied -Name: objection resp 2
Filed 03/04/2008
Comments:
Attachment:
objection resp 2.PDF

Review Status:
Satisfied -Name: DOI Obj #3
Filed 03/04/2008

SERFF Tracking Number: *ALSX-125395027* *State:* *Arkansas*
Filing Company: *Allstate Indemnity Company* *State Tracking Number:* *EFT \$25*
Company Tracking Number: *R18891*
TOI: *17.0 Other Liability - Claims Made/Occurrence* *Sub-TOI:* *17.0021 Personal Umbrella and Excess*
Product Name: *Personal Umbrella*
Project Name/Number: *2007 - DeHoyos Appeals Process Filing/R18891*

Comments:

Attachment:

DOI Obj #3.PDF


Property & Casualty Transmittal Document

1. Reserved for Insurance Dept. Use Only	2. Insurance Department Use only	
	a. Date the filing is received:	
	b. Analyst:	
	c. Disposition:	
	d. Date of disposition of the filing:	
	e. Effective date of filing:	
	New Business	
	Renewal Business	
	f. State Filing #:	
g. SERFF Filing #:		
h. Subject Codes		

3. Group Name	Allstate				Group NAIC #	008
4. Company Name(s)	Domicile	NAIC #	FEIN #	State #		
Allstate Indemnity Company	IL	19240	36-6115679			

5. Company Tracking Number	R18891
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Contact Info of Filer(s) or Corporate Officer(s) [include toll-free number]

6. Name and address	Title	Telephone #s	FAX #	e-mail
Patrick Torsney 2775 Sanders Road, Suite A5 Northbrook IL 60062		800-366-2958 Ext. 27309	847-402-9757	ptors@allstate.com
7. Signature of authorized filer				
8. Please print name of authorized filer	Patrick Torsney			

Filing Information (see General Instructions for descriptions of these fields)

9. Type of Insurance (TOI)	17.0 Other Liability - Claims Made/Occurrence			
10. Sub-Type of Insurance (Sub-TOI)	17.0021 Personal Umbrella and Excess			
11. State Specific Product code(s) (if applicable) [See State Specific Requirements]	N/A			
12. Company Program Title (Marketing Title)	Personal Umbrella			
13. Filing Type	<input type="checkbox"/> Rate/Loss Cost <input checked="" type="checkbox"/> Rules <input type="checkbox"/> Rates/Rules <input type="checkbox"/> Forms <input type="checkbox"/> Combination Rates/Rules/Forms <input type="checkbox"/> Withdrawal <input type="checkbox"/> Other (give description)			
14. Effective Date(s) Requested	New:	03/10/2008	Renewal:	03/10/2008
15. Reference Filing?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
16. Reference Organization (if applicable)	N/A			
17. Reference Organization # & Title	N/A			
18. Company's Date of Filing	12/20/07			
19. Status of filing in domicile	<input type="checkbox"/> Not Filed <input type="checkbox"/> Pending <input checked="" type="checkbox"/> Authorized <input type="checkbox"/> Disapproved			

Property & Casualty Transmittal Document

20.	This filing transmittal is part of Company Tracking #	R18891
21.	Filing Description [This area can be used in lieu of a cover letter or filing memorandum and is free-form text]	

Insurance Scoring Appeals Process

With this filing, Allstate Indemnity Company is implementing an appeals process for Insurance Scoring in the state of Arkansas. The same process will be implemented in all Allstate Group companies and lines that order credit reports for the use of Insurance Scoring in Arkansas. The appeals process will allow consumers whose Insurance Score has been adversely impacted by extraordinary circumstances to appeal the Insurance Score, Allstate has previously assigned to them. If an insured meets the criteria listed in the rule, a neutral Insurance Score will be applied to the policy. The conditions under, which an insured may appeal his or her Insurance Score may be found in the attached Rule Pages.

This change will not affect the way Allstate initially assigns an Insurance Score to an insured. There is no rate change associated with this filing.

Effective Date:

New business: March 10, 2008

Renewals: March 10, 2008

22.	Filing Fees (Filer must provide check # and fee amount if applicable.) [If a state requires you to show how you calculated your filing fees, place that calculation below]
<div style="margin-bottom: 10px;"> Check #: N/A - Paid via EFT. Amount: \$25.00 </div> <div style="margin-bottom: 10px;"> Independent Rule Filings - All P&C Lines = \$25 </div> <div style="text-align: center; margin-top: 20px;"> Refer to each state's checklist for additional state specific requirements or instructions on calculating fees. </div>	

***Refer to each state's checklist for additional state specific requirements (i.e. # of additional copies required, other state specific forms, etc.)

**ALLSTATE INDEMNITY COMPANY
PERSONAL UMBRELLA POLICY
ARKANSAS**

Response to letter dated January 3, 2008 regarding Filing #R18891

1. Please provide more information regarding this proposed rule. Does an insured have to be in Group 1 for it to apply?

If an insured feels that his or her credit information has been negatively impacted by the extraordinary circumstances listed in Rule 5 of the Allstate Indemnity Company (AI) Personal Umbrella Policy Manual, he or she may choose to appeal the Insurance Score that Allstate has previously assigned to him or her. The appeals process mentioned in the memo refers to the process an insured would use to provide proof that his or her credit information has been negatively impacted by the listed extraordinary circumstances. Provided the insured's appeal meets the criteria detailed in the rule, at Allstate's sole discretion, the insured will be assigned to Insurance Score (IS) Group 2 retroactive to the most recent effective date of the policy. Any insured who feels that his or her credit information has been negatively impacted by the extraordinary circumstances listed in Rule 5 may choose to appeal the Insurance Score previously assigned to them; this applies to all insureds, regardless of initial IS Group assignment.

**ALLSTATE INDEMNITY COMPANY
PERSONAL UMBRELLA POLICY
ARKANSAS**

Response to letter dated January 25, 2008 regarding Filing #R18891

1. Please advise how Allstate would assist someone in Groups 3 and higher.

An insured may choose to appeal the Insurance Score that Allstate has assigned to him or her if the insured feels that his or her credit information has been negatively impacted by the extraordinary circumstances listed in Rule 5 of the Allstate Indemnity Company (AI) Personal Umbrella Policy Manual. This applies most specifically to insureds in IS Groups 3, 4, and 5. Provided the insured's appeal meets the criteria detailed in the rule, at Allstate's sole discretion, the insured will be assigned to the neutral insurance score group, IS Group 2, retroactive to the most recent effective date of the policy. Please note that IS Group 1 is the lowest rated and IS Group 5 is the highest rated IS Group.

Studies conducted on the use of credit information consistently show that credit report information is very predictive of insurance loss potential. However, under very extraordinary circumstances, it may be possible that the underlying credit report information is not representative of a person's insurance loss potential, even though it is predictive for the vast majority of risks. Using a neutral score when an extraordinary circumstance has been substantiated essentially puts the insured in the same position as if credit information were not used at all. This is consistent with the proposition that the underlying information is not useful in providing predictive information regarding insurance loss potential.

It is not possible to re-construct what a person's credit report would have looked like had an extraordinary circumstance not occurred. This would involve speculation regarding what a person "would have done differently" had the event not occurred. While it is possible to develop hypothetical comparisons with and without extraordinary circumstances having occurred, it is not really possible to identify who would fall into these categories. Thus we feel that placing an insured in the neutral insurance score group is the most equitable solution to dealing with those affected by extraordinary circumstance. While insureds whose credit report information would place them in a better than neutral group may also have been impacted by extraordinary circumstances, we consider them ineligible to make an appeal. In these cases, it is to the customer's benefit to have us consider their existing credit information rather than to ignore the entire credit report and place them in a neutral insurance score group, resulting in a higher rate.

**ALLSTATE INDEMNITY COMPANY
PERSONAL UMBRELLA POLICY
ARKANSAS**

Response to letter dated February 19, 2008 regarding Filing #R18891

- 1. Per our director, please delete the language stating the effective date is 03-01-08. The correct date is on or after January 1, 2004, and is not at the discretion of Allstate. The subsequent reassignment must be to the “neutral” tier from the credit perspective.**

Allstate is aware of the requirements of Ark. Code Ann. 23-67-405 to 415, and believe our current procedures comply with the requirement. This law requires that we have a process to rerate any customer whose credit information is corrected as a result of the dispute resolution process at the Credit Reporting Agency. We have such a process in place and this process did begin prior to January 1, 2004 when this law became effective. We are now proposing an additional process where a customer may appeal their assignment based upon extraordinary circumstances which have affected their credit report. This process works in addition to, not in place of our current correction process, and allow for customers to make an appeal even though the information present on their credit report is actually correct. Because this is a new process in Arkansas, and goes beyond the requirements of Ark. Code Ann. 23-67-405 to 415, we plan to implement this process on a prospective basis and thus we have proposed an effective date of 3/10/08.

For those who provide sufficient information to demonstrate their extraordinary circumstance, the subsequent reassignment will be to the neutral tier from a credit perspective. Due to the nature of this process, Allstate must be in the position of reviewing and determining the documentation provided by the customer to support their case for an appeal.